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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

DECLARATION OF GLENN ADLER

DECLARATION OF GLENN ADLER

I, Glenn Adler, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am Assistant Director for Policy at the Service Employees International Union (SEIU). I have been employed by SEIU for 22 years. My office is located at the SEIU headquarters at 1800 Massachusetts Ave., N.W., Washington, D.C.

3. SEIU is committed to ensuring that all jobs are good jobs. To that end, part of my work involves advocating for—and supporting workers in their demand for—improvements to jobs involving federal contractor employers. About two million workers work for companies that the federal government has hired through contracts governed by the Service Contract Act (SCA). These are often low-wage jobs—such as call center, janitorial, and food services—in industries with workforces that are predominantly immigrants, Black, Indigenous, and people of color (BIPOC), women, and/or people with disabilities. When federally-contracted workers join together in a union, they are able to win better wages, benefits, and working conditions.

4. SEIU and our affiliates represent approximately 6,000 workers employed by companies who provide cleaning, security, maintenance, and other services at federally-owned and federally-leased sites operated by government agencies, including the Social Security Administration (SSA), Department of Agriculture, Department of Treasury, General Services Administration (GSA), Department of Health and Human Services (HHS), Department of State, Department of Labor (DOL), Department of Homeland Security, Department of the Interior, Department of Housing and Urban Development (HUD), National Science Foundation, and Food and Drug Administration. SEIU members ensure that these sites are clean, safe, and well-maintained for federal employees and visitors.

5. SEIU members who work for federal contractors are often the next in line to suffer the snowballing harms that follow federal employee layoffs. When federal employees are

1 terminated and/or their offices are shuttered, the contracted cleaners, security officers, and other
 2 workers at those sites are not far behind. The 2019 federal shutdown, for example, exposed the
 3 significant harms posed to federally-contracted workers, especially on low- and middle-wage
 4 workers of color. Furloughed workers and those who were laid off lost pay for 35 days or more,
 5 prompting difficult choices about how to cover rent, bills, and food. Some workers' health
 6 insurance coverage was put on hold because their employers could not pay premiums, forcing
 7 workers to decide whether to pay out-of-pocket costs for medical visits and medications or skip
 8 treatment altogether. Other SEIU members faced eviction, power shut-offs, hunger, and the need
 9 to ration lifesaving medication.

10 6. The Smithsonian reported to a Senate Subcommittee, that during the FY 2019
 11 shutdown, 385 contract security officers were laid off due to their "non-essential" designation
 12 and offered employment under other (non-Smithsonian) contracts, and that "many" of those
 13 guards were also authorized to take leave during the shutdown.¹ Without mentioning it—and
 14 perhaps it was unaware—the Smithsonian was reporting on the collaboration between their
 15 security contractor and SEIU Local 32BJ. The union and employer identified alternatives to
 16 layoffs that would cushion the shutdown's financial impact: some of the affected officers were
 17 placed on leave and others were transferred to non-Smithsonian contracts, where they could
 18 continue their employment. But the Smithsonian experience was the exception to the overall
 19 pattern of economic harm faced by federally-contracted workers.

20 7. More recently, in March 2025, after President Trump shut down the U.S. Institute
 21 of Peace (USIP), the Department of Government Efficiency (DOGE) reportedly entered the
 22 building with law enforcement officers and evicted its officials. *See* Exhibit A (N.Y. Times).²
 23 Thereafter, nearly all of the USIP's employees received termination notices, effectively
 24

25 ¹ U.S. Senate Permanent Subcommittee on Investigations, The True Cost of Government Shutdowns, Committee on
 26 Homeland Security and Governmental Affairs 114 (Sept. 17, 2019), available at <https://www.hsgac.senate.gov/wp-content/uploads/imo/media/doc/2019-09-17%20PSI%20Staff%20Report%20-%20Government%20Shutdowns.pdf>.

27 ² Aishvarya Kavi, *Musk's Team Evicts Officials at the U.S. Institute of Peace*, N.Y. Times (Mar. 17, 2025), available
 28 at <https://www.nytimes.com/2025/03/17/us/politics/doge-musk-institute-of-peace.html>.

1 immediately. *See* Exhibit B (NPR).³ All of the SEIU Local 32BJ-represented cleaners who
2 worked for the federal cleaning contractor at USIP were laid off, too.

3 8. Thus, SEIU members are already feeling the impacts of the Trump
4 administration's first phase of federal government restructuring. As the massive overhaul of
5 agencies across the federal government comes into fuller view, the risk of harm to federally-
6 contracted members becomes more imminent, more threatening, and more irreparable. Indeed,
7 an employer recently informed an SEIU affiliate that there will be a staffing reduction for
8 janitors at DOL sites, imperiling the jobs of dozens of federally-contracted SEIU members.

9 9. In addition to janitors at DOL locations, SEIU represents hundreds of federally-
10 contracted janitors at GSA locations, nearly a hundred federally-contracted janitors at State
11 Department offices, dozens of federally-contracted janitors at HHS sites, and dozens of
12 federally-contracted janitors at NASA locations. SEIU also represents hundreds of members
13 employed by companies who provide cleaning, security, and other services at housing authorities
14 in numerous states. These members are at significant risk of losing their jobs due to federal
15 employee staff reductions at these agencies, office closures, and/or lease terminations. When
16 workers lose their jobs, SEIU loses members, which impairs the union's ability to build power
17 within the bargaining unit and the union.

18 10. Even when federally-contracted workers do not lose their jobs, there are often
19 other harms—like furloughs and reduced hours or shifts. For example, janitors who work at DOL
20 sites previously accepted a 1/2 hour reduction per shift to forestall potential layoffs.

21 11. These SEIU members provide essential services to the government. Many live
22 paycheck to paycheck in expensive urban areas, such as Washington, D.C., New York,
23 Philadelphia, and Chicago. Some are single parents with children who depend on them. Others
24 are older and worry about finding jobs with comparable wages and benefits. And, as the above

25 ³ Emily Feng, *U.S. Institute of Peace staff is laid off, escalating legal battle with Trump administration*, NPR (Mar.
26 30, 2025), available at <https://www.npr.org/2025/03/30/nx-sl-5345012/us-institute-of-peace-staff-laid-off-doge-trump>.
27

1 examples demonstrate, reductions in hours, furloughs and, worst of all, layoffs will be
2 devastating for many SEIU members.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct. Executed April 29, 2025, in Washington, D.C,

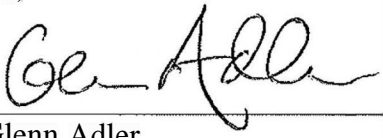
5 
6 _____
7 Glenn Adler

Exhibit A

Musk's Team Evicts Officials at the U.S. Institute of Peace

A bubbling dispute broke into a dramatic standoff that ended with police involvement and the Department of Government Efficiency taking up residence at the independent agency.



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By Aishvarya Kavi

Reporting from the grounds of the U.S. Institute of Peace in Washington

March 17, 2025

A simmering dispute between the Department of Government Efficiency and an independent agency dedicated to promoting peace broke into an open standoff involving the police on Monday, as Elon Musk's government cutters marched into the agency's headquarters and evicted its officials.

The dramatic scene played out in Washington on Monday afternoon as Mr. Musk's team was rebuffed from the U.S. Institute of Peace, an agency that President Trump has ordered dismantled, then entered it with law enforcement officers. Agency officials say that because the institute is a congressionally chartered nonprofit that is not part of the executive branch, Mr. Trump and Mr. Musk do not have the authority to gut its operations.

"DOGE just came into the building — they're inside the building — they're bringing the F.B.I. and brought a bunch of D.C. police," Sophia Lin, a lawyer for the institute, said by telephone as she and other officials were being escorted out.



George Moose, who was fired as the institute's acting president last week but is challenging his dismissal, accused Mr. Musk's team of breaking in. "Our statute is very clear about the status of this building and this institute," he told reporters. "So what has happened here today is an illegal takeover by elements of the executive branch of a private nonprofit corporation."



George Moose, who is challenging his firing as the institute's acting president, was escorted out of the building on Monday night. Kent Nishimura for The New York Times

The standoff quickly became one of the most visible points of resistance to Mr. Musk's effort to fire federal workers and dismantle whole agencies. And it underscored Mr. Trump's willingness to push the legal limits of his authority in his drive to reshape the federal government and put even entities that have traditionally been independent under his thumb.

A spokesman for Mr. Musk's team directed an inquiry to the White House, where officials said the institute's leadership had been dismissed after ignoring Mr. Trump's executive order in February directing it to reduce its operations to the "statutory minimum."

"Rogue bureaucrats will not be allowed to hold agencies hostage," said Anna Kelly, a White House spokeswoman. "The Trump administration will enforce the president's executive authority and ensure his agencies remain accountable to the American people."

The institute was created by Congress in 1984 and works to prevent and end conflict, deploying specialists to work with U.S. allies, training peace negotiators and diplomats and briefing Congress. Since the February executive order, its website was updated with additional references to the "cost-effective" nature of its work, a likely bid to win the favor of Mr. Musk's team.

It did not work. Institute leaders and the Department of Government Efficiency had been butting heads since at least Friday afternoon, when the White House sent all but three of the institute's board members an email telling them they had been terminated.

People trying to get into the United States Institute of Peace on Monday. Eric Lee/The New York Times

The remaining board members — Secretary of State Marco Rubio, Defense Secretary Pete Hegseth and Peter A. Garvin, the president of the National Defense University — later replaced Mr. Moose as acting president with Kenneth Jackson, a State Department official who was involved in the dismantling of the U.S. Agency for International Development.

Ms. Lin said the institute was preparing to sue the administration over the removal of the board. Officials at the institute have refused to recognize those terminations.

Department of Government Efficiency officials first tried to gain access to the agency's headquarters, just off the National Mall, on Friday afternoon, but representatives for the institute turned them away.

Mr. Musk's team showed up again around 7 p.m. on Friday, accompanied by two F.B.I. agents, and showed the institute a document signed by the remaining board members that removed the institute's acting president. But they left after a lawyer for the institute told them it was an independent agency outside the executive branch, Gonzo Gallegos, an institute spokesman, said in a statement on Saturday.

Over the weekend, the F.B.I. threatened institute employees over the lack of access to the building, Ms. Lin said.

Nate Cavanaugh, left, an unidentified woman, and Mr. Jackson, at the institute on Monday, before they were turned away. Eric Lee/The New York Times

She also said that Jonathan Hornok, the new chief of the criminal division of the U.S. attorney's office for the District of Columbia, called George Foote, another lawyer for the institute, on Sunday night and made requests on behalf of Mr. Rubio

and Mr. Hegseth to gain access to the institute's "books and records." When the institute resisted, he threatened a criminal investigation, she said. A spokeswoman for the U.S. attorney's office did not respond to requests for comment.

By Monday afternoon, signs newly posted to the doors of the building warned against trespassing and appeared to have been hastily created. One informed readers that the building was "closed until further notice."

Musk representatives arrived on Monday afternoon in a black S.U.V. with government plates and were escorted by what appeared to be private security who arrived in separate vehicles and were dressed in street clothing.

They tried one entrance, but could not seem to find a way inside and instead circled the building before getting back into the S.U.V.

The institute, which sits near the western end of the National Mall, says President Trump's White House removed its board members unlawfully. Eric Lee/The New York Times

After several minutes, two lawyers for the institute emerged from the building and approached the vehicle. What followed was a window-side negotiation: Mr. Musk's representatives in the car, including a man who identified himself as Mr. Jackson, the State Department official and newly installed agency president, appeared to ask the lawyers to get in.

"I mean, I don't know where you're going to take us," Ms. Lin said, declining.

"We don't want to sit in here," added Mr. Foote, the second lawyer for the institute, in a mellow, coaxing voice. "We can take a walk. We'll take a walk, come on. It's a nice day."

Behind the car's tinted windows, that offer appeared to be declined, and negotiations continued as rush hour traffic backed up behind the stalled vehicle and drivers laid on their horns. The parties appeared to agree to hold a meeting over a video call.



Sophia Lin, left, and George Foote, lawyers for the institute, negotiating with Mr. Jackson and the Musk team outside the building on Monday afternoon. Eric Lee/The New York Times

Mr. Musk's team did not get into the building until officers from Washington's Metropolitan Police Department showed up, Ms. Lin said. Institute officials had called the police to report that Department of Government Efficiency members were trespassing, she said, but the police instead cleared institute leaders from the building.

A police spokesman, Tom Lynch, said that officers were called to the scene on a report of an unlawful entry and said the police left after the people who were seeking unlawful entry had left. He did not say who those people were or provide more information on what happened at the scene aside from the fact that no arrests had been made.

Two of the men, Nate Cavanaugh and Justin Aimonetti, a lawyer, were the same Musk officials who this month forced entry to the African Development Foundation, one of the government entities mentioned in the February executive order. They did not respond to shouted questions.

Late on Monday night, members of the Musk team, who are said to work around the clock, were still at the institute. Mr. Jackson could be seen working in the office of the president. They had dinner delivered: Sweetgreen and six pizzas.

Mr. Jackson, left, working in the president's office at the institute late Monday night. Kent Nishimura for The New York Times

Eric Lee and Kent Nishimura contributed reporting.

Aishvarya Kavi works in the Washington bureau of The Times, helping to cover a variety of political and national news.

A version of this article appears in print on , Section A, Page 15 of the New York edition with the headline: DOGE Evicts Leaders at a Nonprofit That Promotes Peace

Exhibit B

PLAYLIST NEWS
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POLITICS

U.S. Institute of Peace staff is laid off, escalating legal battle with Trump administration

MARCH 30, 2025 · 3:33 PM ET



Emily Feng



The United States Institute of Peace (USIP) headquarters is seen on Feb. 20 in Washington, D.C. The institute has laid off nearly all of its staff.

Kayla Bartkowski/Getty Images

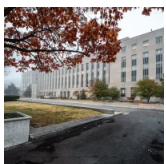
The U.S. Institute of Peace, a government-funded think tank, has terminated nearly all of its U.S.-based employees and is drawing up plans to fire its remaining overseas employees, escalating an ongoing legal battle over whether President

Trump has the authority to dismantle organizations created and funded by Congress.

The firings come after a federal judge declined to block the Elon Musk-led Department of Government Efficiency (DOGE) group from taking control of the U.S. Institute of Peace (USIP) earlier this month.

The termination notices, sent out starting around 9 p.m. on Friday to more than 200 USIP employees, are effective immediately, according to five USIP employees who received the letters. They all spoke to NPR on condition of anonymity, because all had also been given a confidential severance offer of two to four weeks' pay if they waived all rights to take legal action against the think tank.

Staffers were told to sign up for 15-minute windows to go to USIP's Washington, D.C. office to retrieve their belongings. Dozens of overseas employees and contractors have also been notified that they must submit plans on moving themselves to a "safe" location by April 9, after which they also expect to be fired, according to the employees.



LAW

Judge accuses Trump administration of trying to undermine judiciary

Seven former USIP board members are currently suing Trump administration officials installed on the think tank's new board, accusing them of trespassing and

"takeover by force."

"The dismissal of U.S. Institute of Peace employees in the dark of night is unconscionable and deeply troubling," said George M. Foote, an outside counsel for the institute who is supporting the fired board members, in a statement. He also vowed to continue to fight to "reverse the Administration's unlawful attempt to dismantle the Institute."

More court hearings over the lawsuit are set for April.

A think tank under siege

In February, Trump ordered the USIP to effectively shut down its operations as part of a wider effort to drastically downsize the federal government.

USIP management immediately began preparing for a hostile effort to shut down operations, drawing lessons from how DOGE had shuttered wholesale the U.S. Agency of International Development (USAID) just weeks earlier, according to two employees.

USIP's IT staff began taking steps to protect their data systems, according to three former employees. It offered last-minute cybersecurity training to staff in case members of the Trump administration tried to hack their way into USIP's systems. Security staff ordered USIP employees to keep their offices locked and started requiring employees to use security badges to access any entrance way in the think tank's building, according to a senior USIP employee.



POLITICS

Law experts raise alarms over police action in DOGE Institute of Peace dispute

Some employees also began downloading all their research, work contacts, and work emails.

On March 17, DOGE representatives forced their way into the locked USIP building using a physical key they had taken from a former USIP security contractor and with help from the D.C. police.

Working remotely that day, three USIP staffers told NPR they started to notice their Microsoft software services glitching — attempts, they said, of USIP's cybersecurity defenses trying to stop DOGE from penetrating the think tank's servers inside the USIP offices.

DOGE representatives convinced a former USIP IT employee to travel the day after from his base in the state of Georgia to USIP's headquarters in Washington, according to court filings, in order to help DOGE bypass USIP's cybersecurity controls and gain full control over their computer systems.

Shortly after, two employees said they received phishing emails about a nonexistent Microsoft Teams meeting sent from USIP accounts, including one from Ken Jackson, the Trump-appointed acting head of USIP and who was also tapped to briefly head USAID as it was being closed down. Someone then used the same employee's email account to contact an overseas USIP employee.

USIP employees were working remotely when the final termination letters arrived Friday evening in their personal email inboxes and even by WhatsApp message, said two employees, because they have been unable to log into their work computers or email accounts since DOGE took over.

How far does the executive go?

At the heart of the USIP controversy is the question of whether the think tank falls under the purview of the executive branch. Earlier in March, U.S. District Judge Beryl Howell said during a lawsuit hearing there was "confusion" over the think tank's status.

USIP was founded in 1984 by an act of Congress, shortly after a nuclear standoff with the Soviet Union, in order to support scholarship and policy know-how aimed at peace-building. It regularly briefed decision-makers at the Pentagon and the executive branch on issues of foreign policy and national security.

Unlike other federal agencies the Trump administration has taken aim at in its federal cost-cutting campaign, USIP is a private nonprofit, and as such, its staffers were not federal employees.

It also has a nearly \$80 million endowment, which includes its Washington office building, built using funds raised from private donors including Boeing, and thus not government-owned. The land the building sits on was authorized for USIP's use by Congress. It is unclear what will happen to these assets if USIP is closed.

The president of the U.S. is allowed to appoint and remove USIP board members, but must do so with the consent of a majority of the board or with approval from multiple Senate subcommittees.

"This is part of a much larger and more profound issue about the unitary executive and when the executive wins an election, whether they can do whatever they want with any federal funds," said a USIP employee.

Michele Kelemen contributed reporting.